

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 06-
 :
 v. : 18 U.S.C. §§ 666(a)(2) and 2
 :
 RICHARD COSTABILE : I N F O R M A T I O N

The defendant having waived in open Court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Defendant RICHARD COSTABILE was the President of the Ironbound Floor Covering Company, Inc. ("Ironbound"), a commercial flooring company based in Newark, New Jersey.

b. Co-schemer (the "District Employee") was employed by the Paterson Public School District (the "District"). The District Employee was responsible for, among other things, approving District construction and maintenance contracts and recommending which contracts should be renewed by the District.

c. The District was a local government agency that received federal assistance in excess of \$10,000, during the relevant one-year period.

2. In or about 1997, Ironbound began providing commercial flooring services, for the District, pursuant to an annually renewable contract with the District. Ironbound

continued to provide flooring services to the District up to and including the 2002 calendar year.

3. In exchange for the District Employee's agreement to exercise official discretion in favor of Ironbound, such as expediting the payment of invoices submitted to the District by Ironbound, defendant RICHARD COSTABILE made concealed corrupt payments, in the form of goods and services, in excess of \$5,000 to the District Employee.

4. On or about October 26, 2002, in Passaic County, in the District of New Jersey and elsewhere, defendant

RICHARD COSTABILE

did knowingly, willfully, and corruptly give, offer, and agree to give things of value, namely, in excess of \$5,000 in goods and services, to the District Employee, with intent to influence and reward the District Employee in connection with a business, transaction, and series of transactions of the District involving a thing of value of \$5,000 and more.

In violation of Title 18, United States Code, Sections 666(a)(2) and (2).

CHRISTOPHER J. CHRISTIE
United States Attorney